

DEFENDANTS' OBJECTIONS TO DASGUPTA FEES

Date of Service	Page # / Line #	Described service provided	Hours expended	Basis for Objection
10/11/2016 – 7/27/2017	1/1-21; 2/1-20	Multiple meetings with co-counsel regarding case strategy; multiple court appearances	15.3	Vague, excessive, duplicative; Ms. DasGupta did not have an appearance on file in this case until 7/28/2017; Billed for court appearances where co-counsel also billed for appearance
7/28/2017-8/16/2017	2/21-28	Multiple meetings with co-counsel regarding case strategy	0.9	Vague, excessive, duplicative
8/22/2017	3/1, 2, 4, 9, 13, 18, 19, 28, 33, 34,	Multiple discussions of case strategy with co-counsel	2.2	Vague, excessive, duplicative
8/22, 24/2017	3/3, 16	Telephone conference re trial technology	0.2	Trial continued on Plaintiffs' motion
	3/5, 6, 8, 10, 11, 12, 14, 15, 17, 20, 22, 23, 25, 29, 35, 36, 37	Telephone calls to clients; letters to witnesses; trial contact information list; telephone calls to witnesses; attempts to locate witnesses, compiling lists of motions in limine, reviewing / editing pre-trial order; review voir dire questionnaire; review transcript	8.7	Clerical or administrative work that should be billed at paralegal rate
	3/7, 21, 26, 31, 32,	Multiple calls to courtroom staff	0.6	Unnecessary, vague, excessive
	4/1, 9, 10, 16, 21, 25, 26	Multiple meetings with co-counsel regarding case strategy	3	Vague, excessive, unnecessary
	4/2, 3, 4, 6, 7, 8, 11, 12, 13, 14, 15, 17, 18, 20, 22, 24, 27, 30, 31, 32	Telephone calls, subpoena drafting, preparing exhibits, reviewing documents	7.3	Clerical or administrative work that should be billed at paralegal rate.
	4/19	Drafting motion regarding requests to admit	1.2	Motion denied

	4/28	Telephone call regarding “anonymous witness” and defendant Valentin	0.4	Vague; information never disclosed in discovery
	5/1, 7, 9, 11, 12, 15, 17, 19, 20, 21, 23, 24, 25, 28, 29, 31, 35, 37	Telephone calls, drafting tables, preparing exhibit books, drafting letters	9.6	Clerical or administrative; should be billed at paralegal rate
	5/2, 3, 13, 14, 16, 22, 27, 32, 33, 36	Multiple meetings and discussions with co-counsel regarding case strategy	4.4	Vague, excessive, unnecessary
	5/26	Telephone call regarding “anonymous witness” and defendant Valentin	0.2	Vague; duplicative; information never disclosed in discovery
	5/30, 34	Making Google maps	2.7	Duplicative and unnecessary
	5/38	Notice of financial depositions	02.	Plaintiffs did not pursue punitive damages at trial as they traded punitives for costs
	6/1, 7, 10, 13, 19, 20, 22, 23, 25, 28, 31, 33, 34, 35, 37	Multiple meetings and discussions with co-counsel regarding case strategy	1.8	Vague, excessive, unnecessary
	6/2, 5, 17	Related to financial depositions of defendants	0.7	Plaintiffs did not pursue punitive damages at trial as they traded punitives for costs
	6/3, 4, 6, 9, 11, 12, 14, 15, 16, 18, 27, 29, 32	Telephone calls, emails, letters	3.0	Clerical or administrative; should be billed at paralegal rate.
	6/8	Motion regarding requests to admit	0.3	Motion denied
10/18/2017 and 10/27/2017	6/21, 24	Court appearances	1.6	Duplicative; co-counsel billed for these appearances
	6/26	Telephone call regarding “anonymous witness” and defendant Valentin	0.1	Vague, duplicative, information never disclosed in discovery
	7/1, 4, 5, 6, 7, 11, 15, 17, 18, 20, 22, 23, 24,	Multiple conferences with co-counsel discussing case strategy	3.2	Vague, excessive, unnecessary

	26, 28, 30, 33, 34, 36			
	7/2, 3, 9, 10, 12, 14, 19, 21, 27, 29, 31, 32, 35	Telephone calls, contacting witnesses regarding new trial date, sending subpoenas	5.4	Clerical or administrative; should be billed at paralegal rate
11/30/2017	7/16	Review letter from anonymous witness regarding defendant Valentin	0.2	Vague, duplicative, information never disclosed in discovery
1/10/2018	7/25	Court appearance	0.6	Duplicative; co-counsel billed for this court appearance
	8/3, 6, 9, 11, 12, 14, 17, 22, 30	Multiple conferences with co-counsel regarding case strategy	5.7	Vague, excessive, unnecessary
	8/1, 2, 5, 7, 10, 13, 16, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29	Draft subpoenas, draft emails, schedule witnesses	7.3	Clerical or administrative; should be billed at paralegal rate
	9/1, 2, 19, 23, 26, 27, 33, 34	Telephone calls, emails, drafting subpoenas, preparing exhibit books	2.1	Clerical or administrative; should be billed at paralegal rate
	9/3, 9, 15, 24, 35	Multiple conferences with co-counsel regarding case or trial strategy	4.2	Vague, excessive, unnecessary
	9/6, 7, 10, 11, 13, 14, 16, 17, 18, 29, 30	Trial preparations regarding witnesses not called or deemed duplicative at trial	7.1	Excessive, duplicative
7/12/2018	9/22, 31	Meet with Alex Zeier regarding courtroom equipment	0.6	Duplicative of line 8; excessive
	10/2, 5, 10, 11, 12, 14, 15, 17, 19, 20, 22, 23, 24, 27, 28, 29, 30, 31, 39, 40	Telephone calls, prepare exhibits books, load trial lap top, write letters, prepare exhibit folders	15.3	Clerical or administrative; should be billed at paralegal rate

	10/3, 8, 12, 13, 18, 26, 38	Multiple meetings with co-counsel regarding case / trial strategy	2.6	Vague, excessive, unnecessary
	10/4, 21, 32, 34, 35	Trial preparations	2.9	Duplicative of previous entries; excessive hours for tasks involved
	11/2, 11, 12, 19, 22, 27, 28, 35	Multiple meetings with co-counsel regarding case / trial strategy	5.1	Vague, excessive, unnecessary
	11/5, 25	Trial preparations	0.9	Duplicative of previous entries; excessive hours for the task involved
	11/6, 10, 15, 18, 24, 32, 39	Exhibit books, telephone calls, load laptop for trial	1.9	Clerical or administrative; should be billed at paralegal rate
	11/33, 34, 35, 36, 37, 38	Tasks related to Motion to Bar Garcia and Silva and Motion for Admission of Wage Chart	5.1	Motions denied at trial
	12/1, 10, 12, 15, 21, 24, 25, 27, 29, 30, 31, 32	Draft emails, prepare jury books, compile jury instructions for Powerpoint, compile receipts and invoices, order transcripts, telephone calls	6.4	Clerical or administrative; should be billed at paralegal rate
	12/ 4, 5, 8, 23	Review transcripts and prepare trial questions; draft Motion related to Requests to Admit; Load lap top; Compile receipts	5.7	Excessive, unnecessary, related to witnesses not called or motions lost; duplicative of previous entries
	12/6, 11, 16, 19, 22, 26, 28	Multiple meetings with co-counsel regarding case / trial strategy	1.9	Vague, excessive, unnecessary
	13/ 1, 3, 8, 22, 26, 29	Multiple meetings with co-counsel regarding case / trial strategy	1.5	Vague, excessive, unnecessary
8/24/2018	13/5	Prepare for court	0.3	Duplicative of previous entry; excessive time for task
	13/ 9, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21	Telephone calls, drafting documents	1.8	Clerical or administrative; should be billed at paralegal rate
9/26/2018	13/25	Review time sheets for Angela Zaroff	0.9	Unrelated to this case
		Disputed hours	85.6	

		Hours that should be billed at paralegal rate	68.8	
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